

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

IN RE: APPLICATION OF THE UNITED  
STATES OF AMERICA FOR ORDER  
PURSUANT TO 18 U.S.C. § 2703(d)

**UNDER SEAL**

Case No. 1:19-ec-1275

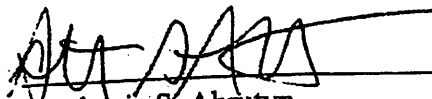
**DECLARATION OF STEPHANIE ABRUTYN IN SUPPORT OF MOTION  
TO QUASH OR MODIFY ORDER ISSUED PURSUANT TO 18 U.S.C. § 2703(d)**

I, Stephanie S. Abrutyn, hereby declare under penalty of perjury:

1. I am Senior Vice President & Chief Counsel, Litigation and Public Policy, WarnerMedia.  
  
In that role, I lead the team responsible for overseeing and managing litigation for Warner Media, LLC (“Warner Media”) and its subsidiaries and brands, including CNN and the Turner networks. Among other things, my team responds to certain government requests for information and other forms of compulsory process.
2. Warner Media was served the above-referenced Order on July 17, 2020.
3. The Order requires the production of information from the email account of Barbara Starr (“the account”), a veteran national security and defense reporter currently employed as a journalist for CNN.
  - a. The account is Ms. Starr’s only business email account.
  - b. Ms. Starr’s beat includes reporting on activities by the U.S. government in the areas of defense, military intelligence and actions, and, more broadly, national security.
4. Upon receipt of the Order, Warner Media promptly took steps to preserve data in the account, collect it for review, and begin review of the records.

5. As directed by the Order and the government, Warner Media has not alerted Ms. Starr to the existence of the Order and is thus unable to discuss its response with her.
6. Despite challenges posed by the need to review materials remotely as a result of the coronavirus outbreak and its inability to discuss the materials with Ms. Starr, Warner Media has identified 34,347 emails sent or received by Ms. Starr's account during the period of June 1, 2017, to July 31, 2017 ("the emails").
7. Of those, over 26,000 are internal emails among only employees working as journalists for CNN, or employees of Warner Media, or another Warner Media subsidiary, many of which appear to relate to internal newsgathering activities and editorial processes.
8. Approximately 7,800 of those emails are communications between Ms. Starr's account and external email accounts, many of which were sent or received in the course of her newsgathering activities.
9. During the period of time at issue in the Order, Ms. Starr published more than 50 articles and appeared in her professional capacity on television or radio more than 150 times.
10. Numerous emails are also to or from what appear to be family members, commercial services (e.g., for shopping purchases, travel reservations), or others in relation to personal issues.

I declare under penalty of perjury that the foregoing is true and correct to the best of my understanding and belief. Executed on September 10, 2020.

  
Stephanie S. Abrutyn  
Senior Vice President & Chief  
Counsel, Litigation and Public  
Policy, WarnerMedia